Todd F. Silbergeld Director-Federal Regulatory SBC Communications Inc. 1401 I Street, N.W. Suite 1100 Washington, D.C. 20005 Phone 202 326-8888 Fax 202 408-4806



September 16, 1996

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Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554 FEDERAL CUMMUNICATIONS COMMISSION OFFICE OF SECRETARY

Re: In the Matter of Federal-State Joint Board on Universal Service

CC Docket No. 96-45

Dear Mr. Caton:

In accordance with the Commission's rules regarding ex parte presentations, please be advised that today Paul Cooper and Glen Sims, representing Southwestern Bell Telephone Company (SWBT), met with Commissioner Laska Schoenfelder, Ms. Karen Cremer, and Mr. Greg Rislov of the South Dakota Public Utilities Commission. The purpose of the meeting was to discuss SWBT's stated positions in the above-referenced docket.

Written materials, which were used during the presentation, are attached to this letter for inclusion into the official record in this docket. Pursuant to Section 1.1206(a)(1) of the Commission's rules, 47 C.F.R. 1.1206(a)(1), two copies of this letter and the supporting materials are provided for your use.

Should you have any questions concerning the foregoing, do not hesitate to contact me.

Sincerely,

Attachment

cc:

The Honorable Laska Schoenfelder (w/o attachment)

Ms. Karen Cremer (w/o attachment)

Mr. Greg Rislov (w/o attachment)

Ms. Kathleen B. Levitz (w/ attachment)

Mr. John Stroman Morabito (w/ attachment)

Ms. Anna M. Gomez (w/ attachment)

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## SOUTHWESTERN BELL TELEPHONE COMPANY

# COMPREHENSIVE FEDERAL AND STATE UNIVERSAL SERVICE PLAN

South Dakota Presentation Pierre September 16, 1996

## **INDEX**

- TAB 1 Definition of Universal Service.
- TAB 2 Why are we concerned?
  - The current basis of Universal Service support.
  - Carrier of last resort obligations remain.
  - Without change, further competitive entry risks ability to maintain Universal Service.
- TAB 3 Proxy cost quantification alternatives are inappropriate and unnecessary.
- TAB 4 SWBT's Comprehensive Federal/State Plan.
  - Jurisdictional responsibility.
  - Eligibility and qualification criteria.
  - Universal Service area.
  - Federal plan.
  - Intrastate plans.
- TAB 5 Other Issues.
  - Competitive bidding is inappropriate and harmful.

## **UNIVERSAL SERVICE DEFINITION**

Widely available basic telephone service at reasonable rates. This obligation requires the deployment of a telecommunications network for use by the general public to accomplish two-way switched voice communication within and beyond a local calling area. This universal service connectivity is provided by loop, switch and interoffice facilities and meets provider of last resort requirements. Basic services provided are:

- Voice grade access to the public switched network with the ability to place and receive calls (includes loop, local switching and local interoffice transport).
- Touch-tone.
- Single-party residential and business local service.
- Access to emergency services (911/E911).
- Access to basic operator services.
- Standard white page directory listing.
- Access to basic local directory assistance.

# FACILITIES WHICH CONNECT CUSTOMERS ARE THE BACKBONE OF UNIVERSAL SERVICE

- 1. The cost of the universally available network varies substantially geographically.
- 2. The sources of revenue to recover the network cost are:
  - Local exchange.
  - Support from toll, access and other services.
- 3. Carrier of last resort obligations remain with the incumbent LEC:
  - For existing customers.
  - Significant additional competition is not expected to be facilities-based, but through resale of service or unbundled facilities. The incumbent LEC still provides carrier of last resort facilities.
- 4. Without changes, further competitive entry, primarily in urban markets, will destroy the basis of support and put at risk the ability to maintain Universal Service.
  - New local entry is targeted primarily at urban areas.
  - FCC Interconnection Order effectively eliminates the ability to support the local exchange network with usage-based access revenues.

# SUMMARY OF ESTIMATED ACTUAL SUPPORT WHICH MAY BE LOST DUE TO FURTHER COMPETITION AND THE FCC INTERCONNECTION ORDER

#### **South Dakota**

Total Interstate State

1. Support from other (primarily toll and access) services to maintain reasonable local rates.

Not Analyzed \$57M

2. Amounts within average toll rates to support reasonable rate levels in high cost areas. Not Analyzed

3. Amounts within average access rates to support reasonable rate levels in high cost areas.

Not Analyzed

4. Support within local services

- Business to Residence

Not Analyzed

- Vertical Svcs to Basic Svcs

Not Analyzed

South Dakota

		South Danota		Esumated					
Study Area	Туре				Total Regulated	Local Exchange	Local Costs	Local Revenues **	Support
Code	Company	Study Area Name	Common Control Name	USF Loops	Costs	Costs	Per Lp/Mo	Per Lp/Mo	Per Lp/Mo
·	Company	Study Area Name	Conuncy Court of Ivame	(a)	(b)	(c)	(d=c/a/12)	(e)	(f=d-e)
391640	Α	ARMOUR INDEPENDENT TELEPHONE CO.		*					
391642	Α	BALTIC TELECOM COOPERATIVE		1,342	800,116	609,455	37.84	17.68	20.17
391649	Α	BERESFORD MUNICIPAL TEL. CO.		*					
391647	C	CHEYENNE RIVER SIOUX		2,258	2,256,071	1,667,032	61.52	40.57	20.95
391650	Α	CITY OF BROOKINGS MUNICIPAL TEL. DEPT.		*					
391653	Α	CITY OF FAITH MUNICIPAL TEL CO		*					
391652	$\mathbf{c}$	Dakota Coop Tel	Dakota Coop Tel	5,687	4,698,040	3,167,925	46.42	16.09	30.33
391643	С	GOLDEN WEST COMM.	GOLDEN WEST TELEPH	*					
391659	C	GOLDEN WEST TELECOMM	GOLDEN WEST TELEPH	12,503	11,059,220	7,859,565	52.38	22.68	29.71
391661	Α	HANSON COUNTY TELEPHONE COMPANY	MCCOOK COOPERATIVE	*					
391654	Α	INTERSTATE TELECOMMUNICATIONS COOP., I	INTERSTATE TELECOM	7,031	5,363,333	4,085,294	48.42	18.07	30.35
391664	Α	JAMES VALLEY COOPERATIVE TEL CO		2,034	1,921,840	1,463,881	59.98	18.93	41.04
391666	C	Jefferson Telephone Co.		524	544,640	277,575	44.14	21.08	23.06
391667	C	Kadoka Telephone Co.		557	557,187	355,106	53.13	20.88	32.24
391668	C	Kennebec Telephone Compant Inc.		271	628,271	408,683	125.67	69.85	55.82
391669	Α	MCCOOK COOPERATIVE TELEPHONE CO.	MCCOOK COOPERATIVE	755	788,185	600,367	66.27	23.72	42.54
391670	Α	MIDSTATE TELEPHONE COMPANY		2,673	2,387,389	1,818,493	56.69	21.50	35.19
391660	Α	MT. RUSHMORE TEL. CO.	STARBUCK TELEPHONE	*					
395145	C	NWB - South Dakota	U S WEST	282,838	168,570,042	120,882,319	35.62	24.98	10.64
391674	Α	ROBERTS COUNTY TEL. COOP. ASSN.		419	479,401	365,164	72.63	29.58	43.05
391676	C	Sanborn Tel. Coop.	Sanborn Tel. Coop.	2,489	2,416,016	1,539,967	51.56	19.92	31.64
391677	Α	SIOUX VALLEY TELEPHONE COMPANY	OLLIG UTILITIES	4,858	3,182,973	2,424,496	41.59	18.16	23.43
391657	Α	SPLITROCK TELECOM COOPERATIVE INC.		3,309	1,972,864	1,502,746	37.84	12.60	25.25
391679	C	Stockholm-Strandburg	Stockholm-Strandburg	210	283,140	195,755	77.68	25.67	52.01
391680	С	Sully Buttes Tel	Sully Buttes Tel	3,999	4,229,218	2,910,121	60.64	22.21	38.43
391682	Α	TRI-COUNTY TELCOM, INC.	LOWRY TELEPHONE CO	424	426,249	324,678	63.81	25.07	38.75
391684	Α	UNION TELEPHONE COMPANY		*					
391685	C	Valley Telco		1,964	1,941,783	1,226,327	52.03	18.91	33.12
391686	Α	VIVIAN TELEPHONE COMPANY	CELLULAR, INC.	*					
391689	С	West River Coop		1,439	2,200,952	1,647,842	95.43	39.74	55.69
391688	Α	WESTERN TELEPHONE COMPANY	MOORE & LIBERTY TEL	*					
		Total		337,584	216,706,931	155,332,791	38.34	24.38	13.97

Estimated \*\*\*

Footnotes: \* Insufficient Information.

<sup>\*\*\*</sup> Includes Federal USF support.

\*\*\* Based on the following 1993 data sources: USF data, Joint Board Data Request, ARMIS data, Monitoring Report for Traffic Data (DEM), and REA Financial Data.

# ESTIMATED ACTUAL NORTHWESTERN BELL SOUTH DAKOTA COSTS DISTRIBUTED TO WIRE CENTERS USING BCM2 PROXY COSTS

	Proxy - BCM2	TOTAL US WEST South Dakota COSTS DISTRIBUTED		
CLLI	per Line, per Mo.	TO WIRE CENTERS		
<u>yen</u>	per mo.	TO WILL OUT TERO		
		Proxy cost times ratio of		
		Average Actual to Average		
		BCM2		
ABRDSDCOH	\$29.27	\$24.20		
ALCSSDCOR	\$57.96	\$47.92		
ARTNSDCOR	\$73.98	\$61.16		
BLFRSDCOR	\$37.83	\$31.28		
BLHKSDCER	\$46.03	\$38.05		
BNSTSDCOR	\$71.68	\$59.26		
BRDLSDCOR	\$79.66	\$65.85		
BRSTSDCOR	\$88.03	\$72.77		
BRTNSDCOR	\$58.69	\$48.51		
BRWRSDCOR	\$76.73	\$63.43		
BURKSDCOR	\$73.36	\$60.65		
BWDLSDCOR	\$79.65	\$65.84		
CAVRSDCOR	\$89.92	\$74.34		
CHBLSDCOR	\$44.43	\$36.72		
CLFDSDCOR	\$108.65	\$89.82		
CLMNSDCOR	\$80.21	\$66.30		
CLRKSDCOR	\$63.13	\$52.19		
CNSTSDCER	\$79.28	\$65.54		
CNTNSDCOR	\$44.45	\$36.74		
CNVLSDCER	\$69.00	\$57.04		
CRSBSDCOR	\$117.98	\$97.53		
CSWDSDCOR	\$76.39	\$63.15		
DDWDSDCOR	\$42.18	\$34.87		
DESMSDCOR	\$57.40	\$47.45		
DOLDSDCOR	\$87.84	\$72.62		
ELPNSDCOR	\$50.51	\$41.76		
EURKSDCOR	\$59.13	\$48.88		
FLNDSDCOR	\$55.36	\$45.77		
FLRNSDCER	\$97.80	\$80.84		
FRDRSDCOR	\$112.69	\$93.16		
FTPRSDCER	\$32.55	\$26.91		
GRGRSDCER	\$61.31	\$50.68		
GTBGSDCER	\$54.51	\$45.06		
HAYTSDCOR	\$83.73	\$69.21		
HDSNSDCER	\$76.88	\$63.56		
HECLSDCOR	\$80.35	\$66.43		
HLCYSDCOR	\$61.38	\$50.74		
HRBGSDCOR	\$49.14	\$40.62		
HRMSSDCER	\$85.11	\$70.36		
HURNSDCOH	\$28.55	\$23.60		

# ESTIMATED ACTUAL NORTHWESTERN BELL SOUTH DAKOTA COSTS DISTRIBUTED TO WIRE CENTERS USING BCM2 PROXY COSTS

	7	TOTAL US WEST
	Descri DOMA	
1	Proxy - BCM2	South Dakota
	per Line,	COSTS DISTRIBUTED
CLLI	<u>per Mo.</u>	TO WIRE CENTERS
		Proxy cost times ratio of
		Average Actual to Average
LIM/DD0D00D	000.40	BCM2
HWRDSDCOR	\$63.10	\$52.16
IPSWSDCER	\$80.17	\$66.27
IRQSSDCOR	\$108.88	\$90.01
LEADSDCOR	\$37.74	\$31.20
LKANSDCOR	\$69.51	\$57.46
LKPRSDCOR	\$68.34	\$56.49
LMMNSDCOR	\$42.41	\$35.06
LSVLSDCOR	\$87.40	\$72.25
MARNSDCOR	\$117.79	\$97.37
MBRGSDCOH	\$40.26	\$33.28
MCINSDCOR	\$88.34	\$73.03
MDSNSDCER	.\$33.54	\$27.72
MLBNSDCOR	\$43.22	\$35.73
MLLRSDCOR	\$46.93	\$38.80
MLLTSDCOR	\$113.74	\$94.03
MRTWSDCOR	\$113.92	\$94.17
MTCHSDCOH	\$30.16	\$24.93
MURDSDCOR	\$91.28	\$75.46
NSLDSDCOR	\$70.04	\$57.90
NWLLSDCER	\$88.53	\$73.19
OLHMSDCER	\$86.85	\$71.80
ONIDSDCOR	\$77.67	\$64.21
PIRPSDCOR	\$240.55	\$198.86
PIRRSDCOH	\$35.14	\$29.05
PLTTSDCOR	\$51.77	\$42.79
PRTNSDCER	\$58.87	\$48.66
RDFDSDCOR	\$44.48	\$36.77
RLNCSDCER	\$65.40	\$54.06
ROSCSDCOR	\$111.11	\$91.85
RPCYSDCOH	\$26.91	\$22.25
RPVYSDCOR	\$41.82	\$34.57
RSLNSDCOR	\$91.58	\$75.71
RVLLSDCOR	\$96.64	\$79.89
SALMSDCOR	\$58.07	\$48.00
SLBYSDCOR	\$81.79	\$67.61
SMMTSDCOR	\$103.42	\$85.49
SPRFSDCOR	\$30.75	\$25.42
SSHRSDCOR	\$88.25	\$72.95
SSTNSDCOR	\$45.82	\$37.88
STRGSDCOR	\$37.20	\$37.86
O INGODOOR	<b>\$31.20</b>	<u> </u>

# ESTIMATED ACTUAL NORTHWESTERN BELL SOUTH DAKOTA COSTS DISTRIBUTED TO WIRE CENTERS USING BCM2 PROXY COSTS

		TOTAL US WEST
ļ	Proxy - BCM2	South Dakota
	per Line,	COSTS DISTRIBUTED
CLLI	<u>per Mo.</u>	TO WIRE CENTERS
		Proxy cost times ratio of
		Average Actual to Average
		BCM2
SXFLSDCOH	\$22.18	\$18.34
SXFLSDSER	\$29.51	\$24.40
SXFLSDSWR	\$26.59	\$21.98
TABRSDCOR	\$68.56	\$56.67
TMLKSDCOR	\$81.67	\$67.52
TRPPSDCOR	\$72.00	\$59.52
TYNDSDCOR	\$41.84	\$34.59
VBLNSDCOR	\$82.13	\$67.90
VBRGSDCER	\$62.63	\$51.77
VOLGSDCOR	\$48.02	\$39.70
VRMLSDCOR	\$32.11	\$26.55
WABYSDCOR	\$77.42	\$64.00
WBSTSDCOR	\$35.19	\$29.09
WGNRSDCOR	\$56.97	\$47.09
WHWDSDCOR	\$62.81	\$51.92
WLLKSDCOR	\$84.65	\$69.98
WLMTSDCOR	\$77.53	\$64.09
WLSYSDCOR	\$94.35	\$78.00
WNNRSDCOH	\$51.27	\$42.39
WRWKSDCOR	\$33.26	\$27.50
WSSPSDCOR	\$53.45	\$44.19
WITHSDCOR	\$99.69	\$82.41
WTTWSDCOH	\$27.84	\$23.01
YNTNSDCOH	\$29.65	\$24.51
AVERAGE	\$38.01	\$31.42

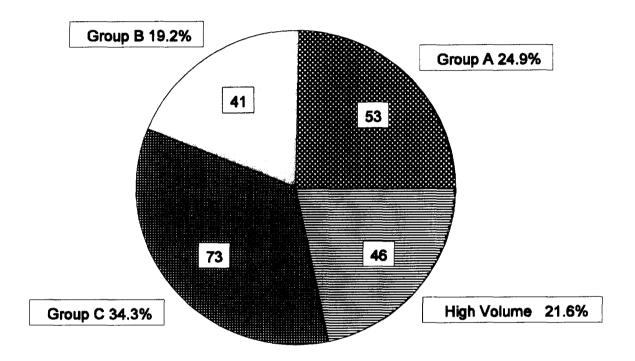
Ratio - Actual to BCM2 Costs

83%

# Summary of Estimated Actual Support Which May Be Lost due to Further Competition and THE FCC Interconnection Order

		<u>Nationwide</u>			<u>So</u>	uthwestern	<u>Bell</u>
		<u>Total</u>	Interstate	State	<u>Total</u>	Interstate	<u>State</u>
1.	Support from other (primarily toll and access) services to maintain reasonable local rates.	\$18.1B	Not Analy	/zed	\$1,536M	\$315M \$	61,221 <b>M</b>
2.	Amounts within average toll rates to support reasonable rate levels in high cost areas.		Not Analyze	d	\$143M	<b>\$</b> 0	\$143M
3.	Amounts within average access rates to support reasonable rate levels in high cost areas.		Not Analyze	d	\$345M	\$215M	\$130M
4.	Support within local services - Business to Residence - Vertical Svcs to Basic Svcs		Not Analyze		\ \$914M	Not Analyze \$0	ed \$914M

# SWBT - Missouri Service Areas 213 End Office Wire Centers



Low Volume - Group A - Under 1,000 Lines

- Group B - Under 2,500, Over 1,000 Lines

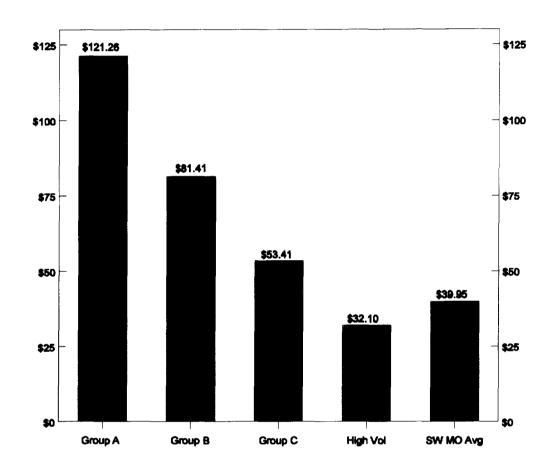
- Group C - Over 2,500 Lines

High Volume (HV) - Over 50M Toll and Access MOU

The majority of areas (wire centers) that SWBT serves are low volume, primarily mid-size and small towns and rural areas.

**SWBT - Missouri** 

## **Geographic Costs To Provide Local Exchange Network**



#### WIRE CENTER GROUPS

	L	ow Volume		Total/	
Ī	Group A	Group B	Group C	High Vol	Average
Number of Wire Centers	53	41	73	46	213
Households per sq mile	8	14	40	436	75
Toll/Access MOU	2%	3%	22%	73%	100%

NOTE: An updated 1995 Study Area Cost Study average cost per access line is \$38.76.

# GEOGRAPHIC COSTS TO PROVIDE LOCAL EXCHANGE NETWORK

- Actual costs to serve vary substantially by geographic area.
- It is more costly to serve low density (largely rural) areas than high density, high volume (largely metro) areas.
- A substantial share of total local exchange costs (\$989M) are devoted to providing service in non-urban areas (\$415M, or 42%).
- Carrier of Last Resort obligations, in particular maintaining capacity needed to serve any reasonable service request have contributed substantially to network costs.
- Highest usage volumes are concentrated in metro areas - 73% in high volume areas.

## **SWBT ACTUAL COSTS ARE REASONABLE**

- SWBT has efficiently deployed investments to provide quality service to both urban and rural customers over many years.
- SWBT's deployment of infrastructure is devoted to upgrading the basic network for residence and business customers.
- The following assertions are wrong and without basis in fact:
  - (a) SWBT has systematically over-invested.
  - (b) SWBT has made poor historical investment decisions.
  - (c) SWBT is deploying its new plant for competitive services, interLATA or video services.
  - (d) SWBT's expenses and investments are overstated due to inefficiencies.
- AT&T and others often make these incorrect assertions, without facts, to support why their proxy models, such as TSLRIC, have investment and expense levels that are approximately 45% less than actual costs.

#### LOCAL EXCHANGE NETWORK ARE REASONABLE SWBT - Missouri 1995

	SWBT	SWBT
		COST %
1		
Direct Facility Invest.	]	
2 COE 3 C&WF 4 IOT	1,099,034,095	
3 C&WF	1,623,530,880	
4 IOT	75,039,189	
5 Operator Systems	10,938,195	
6 TOTAL DIRECT FACILTY INVESTMENT	2,808,542,359	
7 COE Reserves 8 C&WF Reserves	414,319,730 691,113,305	
9 IOT Reserves	41,755,355	
10 Oper Sys Reserves	3,818,139	
11 COE Deferred Taxes	179,633,813	
12 C&WF Deferred Taxes	126,187,549	
13 IOT Deferred Taxes	9,255,719	
14 Oper Sys Deferred Taxes	1,708,367	
15 TOTAL DIRECT FACILTY RESERVES	1,467,791,976	
16 Net Investment	1,340,750,383	
17 Direct Return and Tax	218,646,859	20.59%
Direct Facility Exp.	<u></u>	
18 COE Maint.	51,501,660	
19 C&WF Maint.	100,644,722	
20 IOT Maint.	24,167,753	
21 OS Maint.	840,582	
22 COE Depreciation 23 C&WF Depreciation	96,900,455 81,031,311	
24 IOT Depreciation	5,770,891	
25 OS Depreciation	776,697	
26 Network Operations	81,414,395	
27 Property Tax	55,609,139	
28 Total Direct Expense	498,657,605	46.96%
29 Total Direct Cost	717,304,464	67.55%
29 I Oldi Direct Cost	717,304,404	07.00.70
Customer Service Related Expenses	<u> </u>	
30 Customer Service Exp. (1)	58,728,954	
31 Operator Services (1)	24,698,115	
32 Total Customer Services Expenses	<b>83,427,069</b>	7,86%
OZ TOWN GRACOTTES GETTIOGS EXPENSES	303.72.7,000	
Network and Service Support Investments	]	
33 Gen. Sup. Fac. Inv.	857,523,913	
34 Oth. investment	56,278,361	
35 Gen. SupDef. Taxes	100,090,798	
36 GSF Reserves	255,234,136	
37 Other Reserves	5,938,786	
38 Net Investment	552,538,555	
39 Support Investment Return and Tax	90,106,844	8.49%
	7	
Network and Service Support Expenses	50.040.005	
40 Depreciation (GSF)	50,842,095	
41 Amortization 42 GSF Expenses	4,785,315 (17,567,984)	
43 Other	3,091,945	
44 Other Taxes	11,816,425	
45 Total Support Expenses	<b>5</b> 2,967,795	4.99%
	1	
Common Costs	02 070 505	
46 Marketing 47 Corporate	23,279,585 94,745,819	
TII COI PUI ALC	; <i>उ</i> न्न, १4 <b>२,०</b> ।४	
48 Total Common Costs	118,025,404	11.12%
49 Total Costs	1,061,831,577	100.00%

## **REASONABLE RATES**

Irrespective of geographic local exchange cost differences, the current "reasonable" rates for all are supported to a large degree by either explicit support or support flows implicit in the current rate structure. This support:

• Maintains existing SWBT local rate levels - Low: \$7.55

- High: \$12.50

 Maintains existing geographic (urban vs. rural) rates via statewide intraLATA toll and interLATA access rate averaging.

Major supports are composed of:

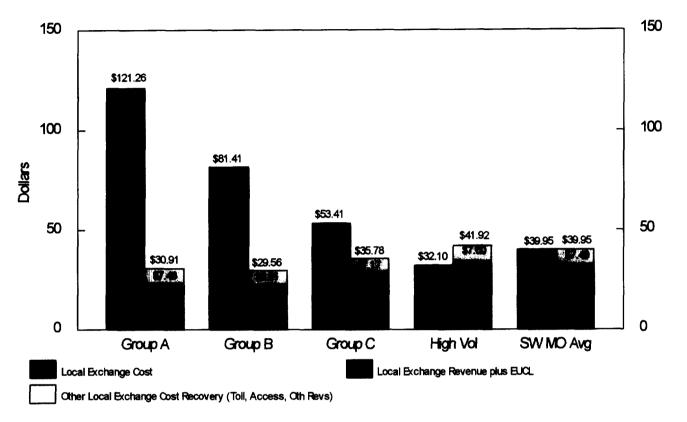
(1) Implicit - Recovery of local costs from toll, access and other customers.

Missouri	Avg Rev / MOU	Avg Loc Exch Support
Toli	\$ 0.19	\$ 0.09
State Access	\$ 0.11	\$ 0.07

- (2) Explicit Federal USF
  - Interstate switch recovery
  - Interstate Long Term Support
  - State support funds
  - Lifeline/Linkup

### **SWBT - Missouri**

# Local Exchange Costs\* and Local Exchange Cost Recovery Per Line Per Month



<sup>\*</sup> Embedded Fully Distributed Cost Analysis

#### WIRE CENTER GROUPS

[	1	ow Volume		Total/	
<u> </u>	Group A	Group B	Group C	High Vol	Average
Number of Wire Centers	53	41	73	46	213
Households per sq mile	8	14	40	436	75
Toll/Access MOU	2%	3%	22%	73%	100%

Low Volume - Group A - Under 1,000 Lines

- Group B - Under 2,500, Over 1,000 Lines

- Group C - Over 2,500 Lines

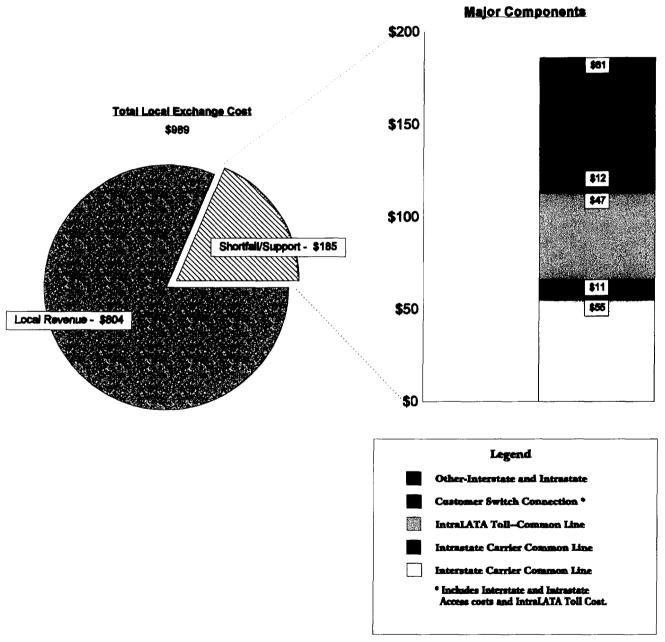
High Volume (HV) - Over 50M Toll and Access MOU

NOTE: An updated 1995 Study Area Cost Study shows Local Exchange cost as \$38.76.

#### **SWBT-Missouri**

## **Analysis of Major Components of** Support To Local Exchange Service

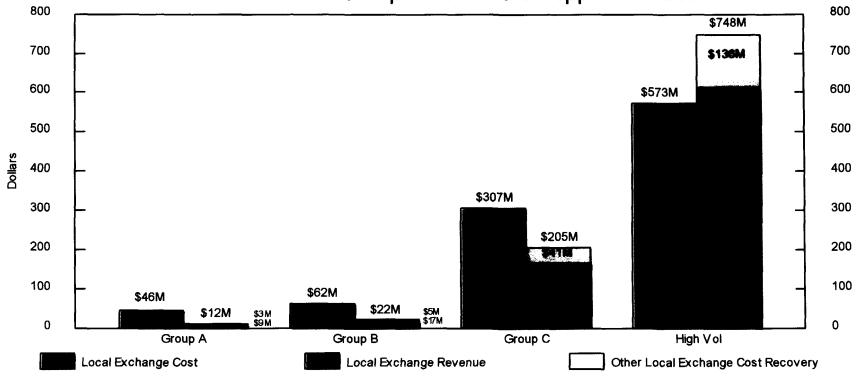




NOTE: An updated 1995 study indicates that this support is now \$205M







Analysis of Support Used and Generated to Recover

Local Exchange Network Costs

				Net
	Support Ge Toll/Acc/Oth	nerated Local	Support Used	Geo graphic Support
	TOWACOUT	LUCAI	Osed	Support
High Volume	\$136M	\$40M	\$0	\$176
Group A-C	\$49M	\$0	\$225 M	(\$176M)
Total	\$185M	\$40M	\$225M	\$0

# SUMMARY MISSOURI LOCAL EXCHANGE SUPPORT

- Total toll, access and other support to maintain existing local exchange rates in Missouri is \$185M.
- In addition, \$40M of suppport for SWBT's rural network in Missouri is provided by urban local exchange customers.
- Local exchange revenues are lower than local exchange costs in most areas of the state.
- In non-urban areas local exchange revenues plus support generated by toll and access customers in those areas does not recover local exchange costs - \$176M short.
- The \$176M shortfall is generated by toll, access and local customers in urban high volume areas.

**SWBT--MISSOURI** 

#### **SUMMARY OF SUPPORT AMOUNTS PER LINE**

	Switched	Local Cost	Local Revenue	Local	IS CCL	ST CCL	Toll/Other	Support	
Exchange #	Lines	/Ln/Mo	/Ln/Mo	Support Req	Rev/Ln/Mo	Rev/Ln/Mo	Support	Generated	Net Support
	а	b	С	d = b - c	е	f	g	h = e + f + g	i = d + h
1	211	294.41	45.22	(249.19)	7.27	2.10	8.37	17.74	(231.45)
2	452	249.01	21.15	(227.86)	1.63	1.81	2.45	5.89	(221.96)
3	422	226.16	21.35	(204.82)	1.13	0.83	1.39	3.35	(201.47)
4	801	195.93	22.84	(173.09)	1.31	1.55	2.05	4.92	(168.17)
5	306	179.93	22.39	(157.54)	1.42	1.42	2.24	5.07	(152.47)
6	131	175.51	24.41	(151.10)	1.25	0.84	1.55	3.64	(147.46)
7	1,180	169.12	19.68	(149.43)	1.20	0.81	1.35	3.35	(146.08)
8	676	170.59	22.57	(148.03)	1.12	0.49	1.28	2.89	(145.13)
9	525	171.85	24.12	(147.73)	1.31	0.58	1.50	3.39	(144.33)
10	625	182.19	37.48	(144.70)		2.03	4.13	9.42	(135.29)
11	497	155.03	18.66	(136.37)	0.97	0.81	1.10	2.88	(133.49)
12	572	156.09	20.71	(135.38)	1.27	0.86	1.64	3.78	(131.60)
13	525	152.37	21.55	(130.83)	1.09	0.71	1.24	3.04	(127.78)
14	699	154.85	24.42	(130.44)	1.62	1.84	2.50	5.97	(124.47)
15	744	150.44	24.06	(126.38)	1.80	0.81	2.11	4.72	(121.66)
16	875	140.78	21.01	(119.77)	0.94	0.58	1.11	2.62	(117.14)
17	398	137.35	18.36	(118.99)	1.56	0.59	1.80	3.94	(115.04)
18	550	139.08	20.25		0.82	1.81	1.65		(114.55)
19	564	137.41	21.73	(115.68)	1.28		2.15		(110.72)
20	318	135.93	22.26	(113.68)	1.12	0.70	1.29	3.11	(110.57)
21	1,084	132.12	18.62	(113.49)	1.13	0.85	1.35	3.33	(110.16)
22	345	135.61	23.20	(112.40)		0.45	2.02	4.30	(108.11)
23	1,904	126.89	16.80	(110.08)			1.53		(106.40)
24	764		35.90	(103.93	0.76	0.31	0.90	1.97	(101.96)
25	535	137.90	35.05	(102.85	1.11	0.46	1.25	2.82	(100.02)
26	745	130.29	29.60		/	0.74	1.81	3.98	(96.71)
27	1,211	119.89	20.17	(99.73	1.29	0.99	1.64	3.93	(95.80)